

his successors in title, as more particularly delineated on the plat of Lewis-town recorded in Land Record Book J. S. 1 at folio 524.

That record title to Lots 138 and part of 137 described above has not been established prior to the deed from Shankle to Bowers in Liber 454, folio 525, except that record title to Lot 138 was held by a Susan C. Schaeffer, by virtue of a deed dated September 10, 1888 and recorded in Liber W. I. P. 6, folio 679.

That the said Susan C. Schaeffer did not divest herself by deed of the said Lot 138, nor has there been any record found of her devise of same, nor her death intestate holding same, nor any other record indicating her divestiture of same.

That no record has been found of the death of one Eugene B. Holt, predecessor in title to Clarence W. Shankle and Daisy S. Shankle, who reserved a life estate in subject premises, although your Plaintiffs believe and aver that said Eugene B. Holt is long deceased.

That by virtue of the foregoing, a question has been raised as to whether Plaintiffs have a good and marketable title to the property described in Paragraph First, by virtue of the fact that there appears to be (a) no existing record title for the part of Lot 137 mentioned and described herein after its subdivision by Daniel Fundenberg in 1815; (b) a gap in record title for Lot 138 between the title of Susan C. Schaeffer and the title of Clarence W. Shankle, et ux.; (c) a possible outstanding life estate interest of Eugene B. Holt, for whom no record of death has been found.

That Plaintiffs and their predecessors in interest have been in actual, exclusive, adverse and peaceable possession of the tracts of land which are the subject of this proceeding, namely, the property described in Paragraph First,